

**Exhibit P**

Audio Transcript – March 19, 2025 call: Plaintiff offers lien release, Ally refuses

### **Exhibit P: Audio Transcript – March 19, 2025 Call**

**Date of Call: March 19, 2025**

**Call Duration: Approx. 43 minutes**

**Ally Representative: Heath (Fraud Department)**

#### **Summary of Key Statements:**

- Plaintiff restated the full timeline of the fraudulent activity surrounding the forged contract dated September 27, 2024.
- Plaintiff informed Heath that the State of Michigan had confirmed the forgery and that the dealership was being referred for fraud violations.
- Plaintiff made clear that Ally was to cease all collection efforts and any repossession attempts while the dispute and court process was active.
- Plaintiff explicitly stated to Heath that if Ally were to issue a lien release and provide a clear title, Plaintiff would consider not pursuing further legal action.
- Heath acknowledged Plaintiff's statements but did not offer a resolution or commit to escalation.
- Plaintiff reiterated that Ally's continued collection emails and repossession efforts would be used as evidence of bad faith and willful intent.

This call is critical in showing that Ally was notified directly through the fraud department, and was offered an off-ramp resolution prior to any legal filings. Their refusal to act in good faith and their continuation of collection activity further supports Plaintiff's claim for exemplary damages and misconduct.